

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI TO
NATIONAL ASSOCIATION OF LETTER CARRIERS, AFL-CIO INTERROGATORY
(NALC/USPS-T4-1)
(January 31, 2012)**

The United States Postal Service provides the response of witness Neri (USPS-T-4) to the above-listed interrogatory of the National Association of Letter Carriers, AFL-CIO, dated January 17, 2012. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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January 31, 2012

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO NATIONAL ASSOCIATION OF LETTER CARRIERS, AFL-CIO
INTERROGATORY

NALC/USPS-T4-1:

On page 29, line 8 of your testimony you state that you “estimate” the productivity improvement percentages that are set forth in Figure 12 of your testimony (pp.29-30). Please explain how you arrived at or calculated or computed each of these estimated percentages and provide any workpapers supporting your estimates.

RESPONSE:

Please see the response to Presiding Officer’s Information Request No. 1,

Question 7.